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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of)
Federal-State Joint Board) CC Docket No.: 96-45
Universal Service)

COMMENTS ON UNIVERSAL SERVICE RECOMMENDED DECISION

COMMENTS FROM:

Ms. Bridget L. Lamont, Director
Illinois State Library
300 S. Second Street
Springfield, IL 62701-1796
(217) 782-2994
blamont@library.sos.state.il.us

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The Illinois State Library is filing these comments on December 10, 1996 in response to the Federal Communications Commission's request for comment on the universal service recommended decision (CC Docket 96-45). The comments address the recommendations on discounts for schools and libraries.

General Comments:

The overall recommendations for discounts for schools and libraries are strongly supported. The Illinois State Library applauds the efforts of the Federal-State Joint Board in developing recommendations concerning the discounts that uphold the intent of the Telecommunications Act of 1996.

In promoting timely access to information for patrons, libraries are faced with many telecommunications-related issues including costs, constantly changing technologies and training. The recommendation of discounts ranging from 20% to 90% per year will be instrumental in assisting libraries in meeting the information needs of their community of users. Limited library budgets in rural and economically disadvantaged areas imperil libraries' ability to pay for telecommunications costs. The recommendations of the Federal-State Joint Board on Universal Service will assist the libraries greatly. In many instances, library patrons cannot afford home access to information technologies; the Federal Communications Commission recommendations will help people gain the information access they need at their libraries.

We strongly support the proposed implementation date of August/September 1997 for the discounts to apply and urge the Federal Communications Commission to meet this target date.

Issues for Comment/Clarification:

Discounts for high cost and low income areas

In addressing Principle 3 in the Telecommunications Act relating to universal service, "Access in Rural and High Cost Areas," the Federal-State Joint Board should make sure that the discounts for rural, high cost areas and for low income areas are figured separately and then combined. A library or school in a rural, high cost area with low income should be eligible for a greater discount than a library or school that meets only one of the two criteria.

Remote access by library users, including students

Parents, students and community members need affordable remote access to information resources during hours when the library is closed.

Consortial efforts

In Illinois and in other states, libraries are working together to provide affordable access to information resources. The discounts need to be easy to compute for group efforts, that in some cases use cost averaging to figure members' financial contributions. Additionally, many libraries are required to purchase telecommunications services through their city or state government. The libraries still must be eligible for the appropriate discounts, regardless of

whether they are purchasing telecommunications services and Internet access through a governmental agency or directly from a provider.

Service providers

The final rules promulgated by the Federal Communications Commission should enable schools and libraries to obtain services that are eligible for a discount through Internet service providers and other companies as well as through telecommunications companies. Keeping a broad number of options should enable libraries to obtain services at more competitive prices, thereby decreasing the demand for universal service fund reimbursement.

Response to Specific Questions Posed By the Federal Communications Commission:

What methods should the Commission use for identifying high-cost (telecommunications service cost) areas for purposes of providing a greater discount to schools and libraries located in high cost areas?

We wish to stress the importance of keeping "high-cost" as one of the factors in determining discounts; the high cost areas are as important to keep in mind as low income. One possibility for identifying high-cost areas, which was alluded to in the initial recommendations from the Federal-State Joint Board, is population density. Many public and community college libraries in Illinois serve large geographic areas with limited population. Although, in some cases, the population density is greater than areas served out West, the rural Illinois libraries are still at a significant economic disadvantage in facing telecommunications costs that are substantially higher than costs in the metropolitan Chicago area. This imbalance must be addressed in order to level the telecommunications playing field for libraries.

What measures of economic advantage may be readily available to identify economically disadvantaged non-public schools and economically disadvantaged libraries or, if none is readily available, what information could be required that would be minimally burdensome?

We support that position being formulated by the American Library Association concerning an alternative method to the free/reduced lunch matrix in the recommended rules that would apply to libraries. There are readily available alternatives to the school lunch calculations that are more applicable to libraries and use existing data that is readily available.

Thank you for your attention to these comments.

Submitted by:



Ms. Bridget L. Lamont, Director
Illinois State Library
300 South Second Street
Springfield, IL 62701-1796
(217) 782-2994